

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:**

**BRADFORD L. COSTELLO, and** : **CHAPTER 11**  
**ARDIS A. COSTELLO,** :  
:  
**Debtors.** : **Bankruptcy No. 20-12358-mdc**

**MOTION FOR APPROVAL OF DEBTORS' DISCLOSURE  
STATEMENT, VOTING MATERIALS AND VOTING PROCEDURES**

The Debtors, Bradford L. Costello and Ardis A. Costello, by and through counsel, Regional Bankruptcy Center of Southeastern PA, P.C., hereby move this Honorable Court for approval of Disclosure Statement, voting materials and voting procedures, and in support thereof respectfully represents as follows:

1. Debtors filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code, 11 U.S.C. §101 et seq. (the “Bankruptcy Code”) on May 20, 2020 (the “Petition Date”) and have continued in possession of their property as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2. The proposed Disclosure Statement and Amended Plan of Reorganization were filed on October 19, 2021. A proposed Order Approving Disclosure Statement and Form of Ballot is attached hereto (the latter marked as Exhibit “A”). All of the foregoing documents comply with all of the requirements of Bankruptcy Code Section 1125.

3. Neither the Debtors, nor their counsel, know of any objection that may be raised to the form and substance of the Disclosure Statement or the Ballot which would delay the hearing

scheduled for the approval of the Disclosure Statement and the approval of the plan voting materials.

4. The Debtors have requested a hearing date for the approval of the Disclosure Statement in accordance with the Bankruptcy Code and notified creditors and interested parties on October 19, 2021. Accordingly, all creditors and parties-in-interest will have received at least twenty-eight (28) days prior written notice of said hearing.

WHEREFORE, the Debtors respectfully request that this Court enter an Order in the form attached granting the relief requested herein and such other and further relief as this Court may deem just and proper.

Respectfully submitted,  
REGIONAL BANKRUPTCY CENTER  
OFSOUTHEASTERN PA, P.C., by:



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